

CALIFORNIA LEGISLATURE

STATE CAPITOL
SACRAMENTO, CALIFORNIA
95814

December 11, 2015

Chair Mary Nichols
Air Resources Board
1001 I street, Sacramento, CA 95814

RE: Aliso Canyon Gas Storage Facility Methane Leak

Dear Chair Nichols,

We write to express our concern that the most recent draft of the Short-Lived Climate Pollutant Reduction Strategy, developed by the Air Resources Board (Board), does not extend to the type of methane leak that is currently on-going at the Aliso Canyon natural gas storage facility in southern California.

While measuring emissions from this type of leak present technical challenges, it is imperative that these emissions be incorporated into the Board's regulations and be included in compliance obligations for greenhouse gases with required mitigation.

On October 23 – seven weeks ago – a significant natural gas leak was discovered at Southern California Gas Company's Aliso Canyon facility located in Senate District 27. The source of the leak appears to be the failed casing of a gas storage well at a location several hundred feet underground. Despite the efforts of experts, the leak continues today, and is likely several months from being plugged.

Since the discovery of the leak, the Board's staff estimates that the leak has been responsible for fully 25 percent of the state's methane emissions – equivalent to the greenhouse gas emissions of driving up to 319,000 cars for a year. In addition, this single leak dwarfs the amount typically estimated to be emitted from oil and gas production.

California, due to both legislative and executive action, is an acknowledged world leader in efforts to limit and reduce emissions of greenhouse gases and other climate-forcing pollutants, such as black carbon, in order to reduce global climate change. The Board, under your leadership, has set the example for the rest of the world on effective, thoughtful action addressing global climate change. Thus the state has been in the vanguard of technical innovation, job growth and public and private investment necessary to meet the defining challenge that global climate change is to the benefit of all current and future Californians.

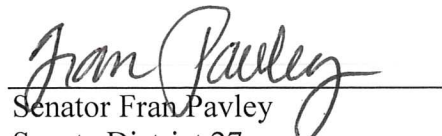
In April, the Governor, via executive order, established a 2030 midterm target of 40 percent greenhouse gas reduction from 1990 levels. One of "five pillars" identified by Governor Brown to meet the midterm target is the reduction of Short Lived Climate Pollutant emissions.


The Board's recently released draft strategy for short lived climate pollutants includes 2030 reduction targets of 40 percent for total methane emissions and 45 percent for fugitive emissions from the oil and gas industry, from 2013 levels. The draft strategy notes that regulations are under development to "create a comprehensive approach to limit methane leaks from oil and gas production, processing, and storage, and from the natural gas pipeline system."


Unfortunately, it appears that the Aliso Canyon leak is not covered under the draft regulations, as written. There are hundreds of gas storage and thousands of injection and other production oil and gas wells in the state. Given record-keeping problems, it is not known how rare failures of this type actually are. Their tremendous impact on total emissions, however, means that they must be addressed by regulation at the earliest possible time.


We share a commitment to California's continued leadership to addressing global climate change. Particularly in view of the Paris 2015 United Nations Conference on Climate Change, the state must improve its efforts to reduce methane emissions from leaking wells.


Sincerely,

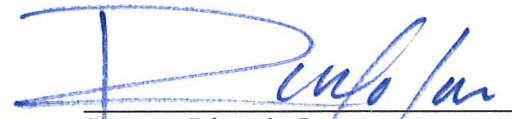

Senator Fran Pavley
Senate District 27

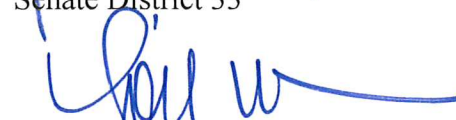

Senator Bob Wieckowski
Senate District 10

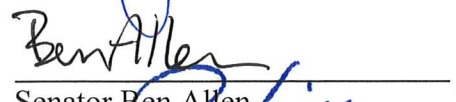

Senator Jerry Hill
Senate District 13

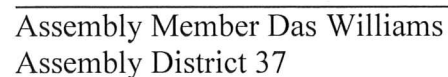

Senator Hannah-Beth Jackson
Senate District 19

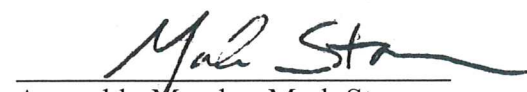

Senator Mark Leno
Senate District 11


Senator Ricardo Lara
Senate District 33


Senator Lois Wolk
Senate District 03


Senator Ben Allen
Senate District 26


Assembly Member Das Williams
Assembly District 37


Assembly Member Mark Stone
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